

EPA Region 5 Records Ctr.



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10/7/92**I. HEADING:****DATE:** 10/07/92**FROM:** LEONARD ZINTAK, OSC, USEPA, RSIII, CHICAGO, IL.....(FAX)**TO:** D. DIETRICH-ATTN:T. JOHNSON, USEPA, OSWER, WASH., D.C....(FAX)
R. BOWDEN, CHIEF, USEPA, EERB, CHICAGO, IL.....(FAX)
P. SCHUTTE, USEPA, OFC. PUB. AFF., CHICAGO, IL.....(FAX)
M. O'MARA, USEPA, ACTING CHIEF, EES, CHICAGO, IL.....(FAX)
B. WARNING, ATTORNEY, ORC, CHICAGO, IL.....(FAX)

D. OSTERFELD, OEPA, COLUMBUS, OH.....(FAX)

T. BUCHAN, OEPA, DERR, PCB SEC., COLUMBUS, OH.....(FAX)

SUBJECT: DENUNE/WESTFALL, COLUMBUS, FRANKLIN COUNTY, OHIO.**POLREP#:** 2 AND FINAL**II. BACKGROUND:**

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| Site No: | FT |
| CERCLIS ID No: | OHD986971315 |
| Administrative Order (AOC): | V-W-89-C-031 |
| AOC Date: | August 31, 1989 |
| Response Authority: | CERCLA |
| CERCLA Incident Category: | Site |
| NPL Status: | No |
| Funded Removal Start Date: | June 23, 1989 |
| Funded Removal Completion: | January 26, 1990 |
| PRP Removal Start Date: | January 26, 1990 |
| PRP Completion Date: | September 29, 1992 |
| LAT: | 81D 01M 10S |
| LONG: | 40D 00M 11S |

III. SITE INFORMATION

A) SITUATION: THE DENUNE/WESTFALL SITE IS AN INACTIVE 4,200 SQ. FT. WAREHOUSE WITH AN ASSOCIATED 800 SQ. FT. OUTDOOR AREA OF CONTAMINATION LOCATED WITHIN A COMPLEX OF ACTIVE WAREHOUSES AND BUSINESSES AT 1725 WOODLAND AVENUE IN COLUMBUS, FRANKLIN COUNTY, OHIO. THE SITE BECAME CONTAMINATED DUE TO THE IMPROPER HANDLING AND DISMANTLING OF PCB-CONTAMINATED TRANSFORMERS. THE SITE WAS DISCOVERED MAY 24, 1989 BY THE OHIO EPA. THE INITIAL FEDERAL RESPONSE TO THE SITE CONSISTED OF A SITE ASSESSMENT ON MAY 26, 1989. THE U.S. EPA CONDUCTED A FUND-LEAD REMOVAL ACTION FROM JUNE 23, 1989 THROUGH JANUARY 26, 1990 DURING WHICH FOUR ELECTRICAL TRANSFORMERS, FOURTEEN 55-GAL. DRUMS, AND 40 CUBIC YARDS OF CONTAMINATED SOIL WERE REMOVED. COSTS UNDER CONTROL OF THE ON-SCENE COORDINATOR TOTALED \$59,414.46 OF WHICH \$33,225.57 WAS FOR THE ERCS.

SUBSEQUENTLY, THE SITE OWNER MR. HARRY C. DENUNE AGREED TO COMPLETE THE REMOVAL ACTION. AN ADMINISTRATIVE ORDER ~~BY CONSENT (AOC)~~ WAS ENTERED INTO AUGUST 31, 1989. SPECIFIC ELEMENTS OF THE UAO INCLUDE: SAMPLING, STAGING AND REMOVAL OF ALL ON-SITE CONTAINERS; DECONTAMINATION OF CONCRETE FLOORING INSIDE THE WAREHOUSE; EXCAVATION OF CONTAMINATED SOILS TO A PCB CONCENTRATION OF 10 PPM AND A MINIMUM DEPTH OF 10 INCHES; AND PROPER DISPOSAL OF ALL WASTES INCLUDING DECONTAMINATION LIQUIDS.

IV. RESPONSE INFORMATION

A) ACTIONS TAKEN:

THE PRP INITIALLY RETAINED THE SERVICES OF CHEMICAL WASTE MANAGEMENT, INC. (CWM) TO CONDUCT SITE CLEANUP ACTIVITIES. MONITORING OF PRP CLEANUP ACTIVITIES WAS PERFORMED BY THE ROY F. WESTON TAT CONTRACTOR. CWM PREPARED A WORK PLAN, PERFORMED SOME SOIL AND WIPE SAMPLING, TRANSFERRED THE EXCAVATED SOILS FROM EPA-RENTED ROLL-OFF BOXES TO THEIR OWN CONTAINERS, AND MADE ONE ATTEMPT AT DECONTAMINATING THE WAREHOUSE FLOORING. THE AGREEMENT BETWEEN THE PRP AND CWM WAS TERMINATED PRIOR TO OCTOBER 1, 1990. AOC-REQUIRED CLEANUP ACTIVITIES WHICH WERE LEFT INCOMPLETE AT THE TIME OF THE TERMINATION OF CWM WERE COMPLETION OF THE DECONTAMINATION OF THE WAREHOUSE FLOORING, COMPLETION OF THE EXCAVATION AND REMOVAL OF CONTAMINATED SOIL, AND SHIPMENT FOR OFF-SITE DISPOSAL OF 40 YARDS OF PREVIOUSLY EXCAVATED SOILS AND OTHER SITE-GENERATED DECONTAMINATION LIQUIDS AND WASTE.

A SECOND CLEANUP CONTRACTOR, BARGAR THOMAS, INC (BTI) WAS RETAINED BY THE PRP. THE ECOLOGY AND ENVIRONMENT, INC. TAT WAS TASKED ON JANUARY 3, 1991 BY THE U.S. EPA TO MONITOR ON-SITE CLEANUP ACTIVITIES AND PERFORM CLEANUP CONFIRMATION SAMPLING. BTI PREPARED AND DELIVERED A WORK PLAN ON JANUARY 4, 1991 TO THE U.S. EPA WHICH WAS SUBSEQUENTLY REVISED ON FEBRUARY 13, 1991 AND ACCEPTED. THE WORK PLAN CALLED FOR REDUCTION OF CONCRETE FLOOR CONTAMINATION BY GRINDING TO 100 MICROGRAMS/100 SQUARE CENTIMETERS (UG/100 CM²) FOLLOWED BY ENCAPSULATION WITH TWO COATS OF DIFFERENT COLORED EPOXY-BASED PAINT. THIS PROPOSAL WAS TENTATIVELY ACCEPTED BY THE U.S. EPA OSC PENDING FORMAL APPROVAL BY THE REGIONAL ADMINISTRATOR.

BTI BEGAN ON-SITE FLOOR GRINDING (DECONTAMINATION) OPERATIONS ON FEBRUARY 28, 1991. HOWEVER, OPERATIONS WERE QUICKLY TERMINATED DUE TO THE EXCESSIVE GENERATION OF DUST WHICH BTI WAS UNABLE TO ADEQUATELY CONTROL WITH WATER SPRAY. BEGINNING MARCH 7, 1991 ATTEMPTS WERE MADE TO DECONTAMINATE THE WAREHOUSE FLOORING BY SOLVENT WASHING. THIS METHOD PROVED INEFFECTIVE AS WIPE SAMPLING AFTER FIVE WASHINGS RESULTED IN A NET INCREASE IN SURFACE PCB CONCENTRATIONS. BEGINNING APRIL 1, 1991, BTI RESUMED CONCRETE GRINDING OPERATIONS USING DIFFERENT GRINDING EQUIPMENT AND A MORE EFFICIENT WATER SPRAY. GRINDING OPERATIONS WERE SUPPLEMENTED BY INTERMEDIATE SAMPLING AND THE USE OF JACKHAMMERING TO COMPLETE DECONTAMINATION OPERATIONS IN CERTAIN SECTIONS OF THE WAREHOUSE. THE PRP COLLECTED ITS OWN CLEANUP CONFIRMATION SAMPLES WITH TAT MONITORING. PRP ANALYTICAL RESULTS WERE VALIDATED BY TAT QA

CHEMISTS. ON DECEMBER 18, 1991, BTI SUBMITTED A LETTER TO THE REGIONAL ADMINISTRATOR ON BEHALF OF THE PRP REQUESTING PERMISSION TO PROCEED WITH ENCAPSULATION OF THE CONCRETE WAREHOUSE FLOORING, HAVING ATTAINED 100 UG/100 CM2 OR LESS VIA REPRESENTATIVE WIPE SAMPLING. APPROVAL TO ENCAPSULATE WAS GRANTED BY THE REGIONAL ADMINISTRATOR ON JANUARY 10, 1992. SUBSEQUENTLY, THE WAREHOUSE FLOORING WAS GROUTED WITH CEMENT AND SEALED WITH TWO COATS OF DIFFERENT COLORED EPOXY-BASED PAINT.

ON AUGUST 8, 1991, BTI PRESENTED A REVISED WORK PLAN TO THE U.S. EPA FOR THE REMOVAL OF CONTAMINATED OUTDOOR AREAS AND FINAL DISPOSAL OF ALL WASTES. EXCAVATION WORK AND SAMPLING HAD BEEN ONGOING CONCURRENTLY WITH THE INDOOR DECONTAMINATION. HOWEVER, CONFIRMATION SAMPLING BY TAT PERFORMED ON MARCH 26, 1991 SHOWED THE CONTAMINATION HAD NOT YET BEEN REDUCED BELOW 10 PPM. IN ADDITION TO THE EXCAVATED SOIL AREA AND THE TWO ROLL-OFF BOXES REQUIRING DISPOSAL, A CONCRETE LOADING DOCK AREA, WHICH HAD BEEN USED AS A TRANSFORMER BREAKING AREA, SOIL UNDER THE ROLL-OFF BOXES, A DOORWAY AND SOME ADDITIONAL SOIL AREAS WERE IDENTIFIED FOR REMOVAL. THE DOORWAY AND ADDITIONAL SOIL AREAS NORTH OF THE WAREHOUSE WERE IDENTIFIED BY TAT THROUGH THE USE OF FIELD SCREENING KITS AS POTENTIALLY CONTAMINATED. APPARENTLY, PCB CONTAMINATION IN EXCESS OF 50 PPM HAD BEEN CARRIED INTO THESE AREAS BY WORKERS ENTERING AND EXITING THE WAREHOUSE. CONTAMINATION OF THE DOORWAY WAS CONFIRMED BY PRP SAMPLING. THE TAT PERFORMED CONFIRMATION SAMPLING FOR THE SOIL UNDER THE ROLL-OFF BOXES AND THE NORTH SOIL AREAS ON FEBRUARY 27, 1992. THE TAT SAMPLING SHOWED A MAXIMUM OF 34 PPM PCB IN SOIL INDICATING NO FURTHER ACTION WAS NECESSARY IN THOSE AREAS.

DECONTAMINATION OF THE LOADING DOCK AND DOORWAY AREA WAS ACCOMPLISHED AND CONFIRMED BY SAMPLING.

FINAL EXCAVATION OF THE MAIN SOIL EXCAVATION AREA WAS COMPLETED ON MAY 26, 1992. APPROXIMATELY EIGHTY CUBIC YARDS, FIVE TRUCKLOADS, OF PCB CONTAMINATED SOIL WERE REMOVED. THE TAT UTILIZED IMMUNOASSAY-BASED FIELD SCREENING TEST KITS TO DETERMINE THE ENDPOINT FOR EXCAVATION BEFORE COLLECTING CONFIRMATORY SOIL SAMPLES FOR LABORATORY ANALYSIS. EXCAVATION CONTINUED TO A MAXIMUM EXCAVATION DEPTH OF APPROXIMATELY THREE FEET. THE USE OF FIELD SCREENING TO OBTAIN IMMEDIATE FEEDBACK FOR THE ATTAINMENT OF ENDPOINT SAVED THE PROJECT APPROXIMATELY THREE TO SIX WEEKS LAG TIME AND 50% IN ANALYTICAL COSTS COMPARED TO THE TRADITIONAL OFF-SITE LAB APPROACH WITH STANDARD TURNAROUND TIMES. THE ATTAINMENT OF THE 10 PPM CLEANUP STANDARD FOR SOILS WAS CONFIRMED BY THE LABORATORY SAMPLING RESULTS.

DISPOSAL OF CONTAMINATED CONCRETE, SOILS, AND SITE-DERIVED WASTES WAS ARRANGED BY BTI TO BE PLACED IN THE CWM MODEL CITY LAND DISPOSAL FACILITY. CONTAMINATED WATER FROM THE FLOOR WASHING AND GRINDING OPERATIONS WAS SAMPLED, FOUND TO MEET STATE AND FEDERAL REGULATORY REQUIREMENTS IF FILTERED, AND WAS DISCHARGED THROUGH A FILTER INTO THE CITY OF COLUMBUS SEWER SYSTEM AFTER OBTAINING THE NECESSARY PERMITS.

RESTORATION OF THE SITE CONSISTED OF BACKFILLING EXCAVATED SOIL AREAS WITH GRAVEL AND RESTORATION OF CONCRETE AREAS WITH GROUT.

THE COMPLETION OF ALL AOC REQUIREMENTS WAS ACCOMPLISHED ON SEPTEMBER 29, 1992 WITH THE TRANSPORTATION FOR OFF-SITE DISPOSAL OF THE LAST ROLL-OFF CONTAINER OF WASTE. THE U.S. EPA OSC AND AN OHIO EPA REPRESENTATIVE PERFORMED A SITE WALKTHROUGH ON AUGUST 31, 1992.

B) FUTURE ACTIONS

THE PRP, HARRY DENUNE, WILL SUBMIT TO THE U.S. EPA OSC A FINAL REPORT WHICH SUMMARIZES PRP REMOVAL ACTIONS AND DOCUMENTS THE ATTAINMENT OF CLEANUP LEVELS AND OTHER REQUIREMENTS DELINEATED IN THE AOC. THE TAT WILL ALSO COMPLETE AND SUBMIT A FINAL REPORT SUMMARIZING ITS MONITORING ACTIVITIES.

V. PRP MONITORING COSTS (THROUGH 09/19/92)

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| TAT (ECOL. & ENVIR.) | \$ 59,993.80 |
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